

CENTENNIAL COMMUNICATIONS

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March 24, 2005

David Solomon, Chief
Enforcement Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

John Muleta, Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Ninth Quarterly Report of Centennial Communications Corp.
On E911 Compliance**

Dear Messer's Solomon and Muleta:

Pursuant to the FCC's Order to Stay issued in CC Docket No. 94-102,¹ and the request of Commission staff, Centennial Communications Corp. ("Centennial") hereby voluntarily files this ninth Quarterly Report detailing our progress in deploying Phase I and Phase II enhanced 911 ("E911") service in our markets. Centennial filed its last quarterly progress report on August 2, 2004. Because Centennial provides CMRS service both in and outside of the continental United States, this report is divided into two sections -- the first explaining the status of Phase II E911 deployment in Puerto Rico, and the second part reports on Phase II E911 deployment in our domestic markets. In addition, we are attaching the Excel spreadsheet detailing our E911 implementation status.²

I. Puerto Rico/U.S. Virgin Islands

Centennial Puerto Rico License Corp., a subsidiary of Centennial, holds the B block broadband PCS license for MTA 25 – Puerto Rico/US Virgin Islands. Centennial has chosen a network-based solution to deploy Phase II E911 in this

¹ FCC 02-210, released July 26, 2002.

² See *Public Notice, Wireless Telecommunications Bureau Standardizes Carrier Reporting on Wireless E911 Implementation*, DA 03-1902, released June 6, 2003.

MTA. A single PSAP serves Centennial's entire Puerto Rican service area. On November 4, 2003, Centennial received a request for Phase I and II E911 service from this sole PSAP. Centennial and the PSAP had been working towards deploying both Phase I and Phase II E911 service in Puerto Rico by July 15, 2004. However due to persistent equipment compatibility problems between Centennial and the PSAP, the parties agreed to extend the Phase II deployment target until August 20, 2004. At this time, both Phase I and Phase II service have been implemented.

Centennial also provides service to the U.S. Virgin Islands of St. Croix and St. Thomas under its B Block license for MTA 25. Each island is served by a single PSAP; however neither PSAP has made a request to Centennial for either Phase I or Phase II E911 service.

II. Domestic Markets

Through five different subsidiaries,³ Centennial holds licenses to provide digital cellular service in 30 markets in the Midwest and Southern United States. Centennial provides cellular service in the following six states: Indiana, Louisiana, Michigan, Mississippi, Ohio and Texas. Centennial has chosen a network-based solution offered by Andrew Corporation to deploy Phase II E911 in its domestic markets.⁴

Phase I Service – Centennial continues to make significant progress initiating Phase I service to PSAPs. As we have previously reported, Centennial continues to receive PSAP requests for Phase I E911 service and we continue to implement Phase I service as valid requests are received. Phase I E911 service has been fully deployed in our Texas markets, and as of March 2005, Phase I E911 service was fully deployed to all PSAPs in Indiana and Louisiana where Centennial operates and for which requests have been submitted. At present, we still have not received any valid requests for Phase I E911 service from PSAP's in the state of Ohio. Since we filed our last report, Centennial has activated Phase I service in Branch, Hillsdale, Lenawee, Mecosta, Montcalm and Roscommon, MI. Currently, we are working on deploying Phase I service in Evangeline Parish, Louisiana.

Phase II Service – As we have previously advised the Commission, we are implementing Andrew Corporation's "Geometrix" network overlay solution for E911 Phase II compliance in our domestic markets. As detailed in the attached Excel

³ Baucé Communications of Beaumont, Inc., Centennial Michiana License Company LLC, Centennial Southeast License Company LLC, Elkhart Metronet, Inc. and Lafayette Cellular Telephone Company.

⁴ See Centennial Communications Corp. Amended Report on E911 Reporting Requirements, filed September 9, 2002.

spreadsheet, since the filing of our last quarterly report, we have activated Phase II service in eleven additional markets - four in Indiana, two in Louisiana, and five markets in Michigan. We presently have hardware installed in seven markets with accuracy and acceptance testing scheduled for the next two months. Additionally, we have ten markets in various stages of the implementation process. From all indications, we expect to receive three requests for Phase II service from Indiana and Michigan in the upcoming quarter. We also expect to receive requests from all of the PSAPs that we serve in Texas between now and June of 2005.

As we have previously reported, Centennial still has not received any Phase II E911 service requests from PSAPs in Mississippi or Ohio. In Indiana, we continue to work with the Indiana Enhanced Wireless 911 Board and its Cost Recovery Group ("Indiana Board") in coordinating Phase II E911 deployment, and with the PSAPs in Indiana that have not yet perfected their Phase II requests. Centennial continues to negotiate mutually acceptable deployment target dates with each PSAP that has submitted a valid request for Phase II service when circumstances dictate that deployment cannot be accomplished within six months from our receipt of a valid request. In addition, we continue to work cooperatively with these PSAPs when we encounter issues that result in delays to the previously-negotiated mutually acceptable deployment dates.

In sum, because Centennial has negotiated mutually acceptable Phase II implementation schedules with each of the PSAPs in its domestic markets that had submitted valid Phase II requests,⁵ Centennial presently is in compliance with all applicable Phase II deployment benchmarks.

III. Affidavit

I hereby declare under penalty of perjury that the information provided in this response is true and accurate to the best of my knowledge, information and belief.

If you have any questions regarding this report, or require additional information, please contact me, or Terry Cavanaugh at Cole, Raywid & Braverman, LLP, counsel for Centennial, at 202-828-9857.

Sincerely,

/s/ William Roughton

William Roughton

⁵ See *Order on Reconsideration, Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Petition of City of Richardson, Texas*, FCC 02-318, released November 26, 2002

Affairs

Vice President, Legal and Regulatory

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